

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

10 Civ. 6005 (RWS)

-against-

THE CITY OF NEW YORK, et. al.,

Defendants.
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PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. Do any of you know any of the attorneys or parties, directly or indirectly?
2. Please tell us about your work experience, beginning with who you work for now and what your job is.
3. Where are the other members of your immediate family employed?
4. How many years of formal education do you have?
5. Were you ever in the military?
 - a. What ranks did you hold?
 - b. What duties did you have?
 - c. Were you ever in the military police?
6. Have any of you ever sued as a claimant in any injury case? [If prior experience, details to be probed].
7. Have any of you, or a family member, ever been sued by someone for any reason?
8. Have any of you, or a family member, or a friend ever been involved in any type of incident involving medical malpractice? [If so, did any claim arise out of that incident? Did you make a claim? Was a claim made against you? Was it resolved to your satisfaction?]
9. Do you have any opinions concerning medical malpractice in general, whether favorable or unfavorable? What are these opinions?

10. This is a case in which the plaintiff, a former police officer, has sued Jamaica Hospital and some of its attending physicians. Would you have any difficulty being completely fair and impartial in such a case? If so, please explain.

11. Are you or any member of your family or any friends employed by Jamaica Hospital?

12. Have you or any member of your family or any friends ever been treated at Jamaica Hospital?

13. Have you or has any member of your immediate family ever held any job in the medical field? If so, what was/is their position?

14. Have any of your neighbors, friends or relatives ever held a job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?

a. Did they ever talk to you about their job?

15. Does your job cause you to work with any medical professionals or hospitals?

16. Are you or any member of your family or any friends employed by the, State of New York, City of New York, the MTA, or the New York City Transit Authority or any other municipal agency?

17. Are you or any member of your family or any friends a prosecutor, police officer, peace officer, corrections officer, or involved in traffic enforcement or any type of job that involves public safety or law enforcement?

18. Have any of you served as a juror at a trial before? If so, was it a civil or criminal proceeding? Have you ever served as a jury foreperson? Have you ever served as a juror on a grand jury?

19. Have any of you had prior jury service in a civil case? Have any of you had prior jury duty in a medical malpractice case? Have any of you had prior jury duty in a case on which Law Enforcement officer was a party? Has that jury service given you any feelings against either a party suing or person defending a lawsuit?

20. Have you ever had to appear in court, or in any legal proceeding, for any reason other than jury duty? If yes, please state when and explain why you appeared in court.

21. Do any of you have any feelings about a person bringing a lawsuit?

22. Do you have feelings or believe that lawsuits are not the proper way for someone to seek compensation for damages they believe was caused by someone else?

23. Do you have any feelings about medical malpractice lawsuits?

24. Do you know anyone who has ever sued or been sued in a medical malpractice case?

25. Are you, or is any member of your family or any friend, a lawyer? If so, what type of law is practiced?

26. Are you, or is any member of your family or any friend, a doctor, a dentist or medical professional? If so, what field of medicine is practiced?

27. Has anyone read any articles or literature, or heard any discussions or public speakers, concerning tort reform and the amounts of verdicts in civil cases? If so, have you formed any opinions or ideas with reference to amounts of jury verdicts? Do you have any opinions that, based upon what you may have heard in the media, there should be limit on the amounts a plaintiff should be entitled to recover?

28. In this case, two of the defendants are attending psychiatrists at Jamaica Hospital. Do any of you feel a medical doctor is more worthy of belief than another member of the public? Do any of you feel that a medical doctor is somehow more credible than another member of the public?

29. If a civilian and a medical doctor official give conflicting testimony about the same incident, would you be inclined to believe the medical doctor over the civilian and why?

30. Do you know of any reason whatsoever why you could not sit in this case and render an impartial verdict with full justice to all parties to the litigation?

31. There has been a significant amount of coverage about this case in the media. Have you or any member of your family or a close friend read or heard about this case in the news?

a. If so, have you formed an opinion about the facts in this case?

32. Have you seen any video or heard anything on the radio or internet related to Adrian Schoolcraft?

33. Have you ever heard the name Adrian Schoolcraft prior to today?

34. You may hear testimony in this case regarding "whistleblower" activity. Do you have any opinion about whistleblowers? If so, what is that opinion?

35. Do you have any religious or personal beliefs which prevent you from awarding money damages for any reason?

36. Will you keep an open mind until you have heard all of the evidence and have received the charge as to the law applicable before making any determination concerning this case?

Dated: New York, New York
October 23, 2015

A handwritten signature in blue ink, appearing to read 'J. Norinsberg', with a long horizontal line extending to the right.

By:

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TO: *All counsel for defendants.*